

Aetna Better Health® of Louisiana
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November 4, 2019

VIA E-MAIL ONLY

Ms. Stacy Guidry
Section Chief – Medicaid Program Operations and Compliance
Louisiana Department of Health
628 North 4th Street
Baton Rouge, LA 70802

RE: Notice of Action for Aetna Better Health's NEMT Vendor/Provider Non-compliance

Dear Stacy:

This is in response to the Notice of Action received by Aetna Better Health of Louisiana on October 21, 2019 regarding NEMT Vendor/Provider non-compliance.

- 1. ABH failed to properly oversee and monitor its NEMT broker to ensure that all its transportation providers are in compliance with insurance requirements in accordance with its contract with LDH.**
 - Annual desktop audits are performed by the Aetna National Delegation Oversight team, with the last audit having taken place in March 2019.
 - We will be conducting an onsite audit of our NEMT broker's files on or before December 31, 2019.
 - We will audit Worker's Compensation insurance for a random sample of providers on a monthly basis.
 - Alexandria Transportation has been required to provide documentation of their Workers Compensation insurance.
 - 1st Choice did have the required Workers Compensation insurance and it was verified by LGTC and Aetna
 - LGTC will improve the pre-screen process when onboarding new TP's.
 - LGTC will also implement a two-step verification process and will audit 100% of all Louisiana providers every six months to ensure compliance.
- 2. ABH failed to properly oversee and monitor LGTC to ensure that the company consistently and timely provided transportation to critical medically necessary services, resulting in patient no-shows to appointments as reported by members and service providers.**
 - Aetna previously responded to LDH about these "reported issues." Responses to LDH showed that all information reported to LDH was not completely accurate and each of the items were addressed promptly with action plans.
 - LGTC will be providing a weekly no-show report going forward that will be reviewed and analyzed for trends.
 - Aetna will receive both provider and member no-show data weekly and analyze and put into place the necessary corrective actions with LGTC.
- 3. ABH failed to properly oversee and monitor its NEMT brokerage program to ensure compliance with vehicle, driver and credentialing requirements in accordance with its contract with LDH and state law requirements.**
 - LGTC reports that all appropriate permits were obtained for those providers required to have them. No specific provider was listed by LDH for more research to be conducted.
 - We will be conducting random monthly audits of providers permits that are required in accordance with state law requirements and the contract with LDH.

- LGTC will analyze trips originating in Orleans and Jefferson parishes to ensure proper permits are in place.
 - LGTC will improve the pre-screen process when onboarding new TP's.
 - LGTC will also implement a twostep verification process and will audit 100% of all Louisiana providers every six months to ensure compliance.
- 4. ABH failed to properly oversee and monitor LGTC to ensure compliance with all applicable provisions of 42 CFR §438. 608 and 438.610 pertaining to debarment and/or suspension.**
- LGTC reports they have not identified any employees or drivers that have failed the exclusion screenings.
 - ABH will perform random monthly audits to ensure all employees and drivers remain in compliance with all applicable provision.
 - LGTC currently runs monthly exclusion checks through Streamline Verify. They will provide a list of all company and driver names included in all screenings along with how they are checked. Every single company and driver participating in the network shall be included in that list with their official name that also matches the credentialing documents. There may be a timing issue with when the runs take place and when a Transportation Provider may be excluded.
- 5. ABH has failed to properly oversee and monitor LGTC's performance.**
- We will be conducting an onsite audit of our NEMT broker's files on or before December 31, 2019.
 - Weekly and monthly reports will be analyzed for trends.
 - We will continue to perform annual desktop audits to ensure all contractual requirements are being met.
 - As issues have surfaced, they have been promptly addressed with LGTC and resolved to the best of our ability.

Please advise of your approval and if you have any questions.

Sincerely,



Richard C. Born, CEO
Aetna Better Health of Louisiana